

STATEMENT OF BASIS (AI No. 105700)

for draft Louisiana Pollutant Discharge Elimination System permit No. **LA0117994** to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Air Logistics, LLC
Galliano Facility
4605 Industrial Drive
New Iberia, LA 70560

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Lisa Kemp

DATE PREPARED: October 23, 2009

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permits – LA0117994
LPDES permit effective date: March 1, 2004
LPDES permit expiration date: February 28, 2009

C. Date Application Received: December 23, 2008; updated application received on August 24, 2009; additional information received on September 21, 2009 and October 15, 2009.

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - heliport**

This is an existing heliport terminal and shop. Helicopter transportation is provided for the oil and gas industry. Approximately 30 helicopters are washed per day. There are 55 employees. The facility also operates 30 mobile homes used for crew who work offshore during the day and sleep there at night. Additional space will be added to the aircraft parking area and the passenger terminal. Because the load on the existing plant fluctuates greatly with passenger volume and demands, the facility plans to add a surge tank upstream of the existing sewage treatment plant.

A new pad for four helicopters is currently being constructed. A new oil/water separator will service this pad. Outfall 003 has been added to the permit for equipment washwater from the new pad.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: III
4. SIC code: 4522

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C. LOCATION - 18594 LA Hwy 3235, in Galliano, Lafourche Parish
Latitude 29° 24' 49", Longitude 90° 18' 2"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: treated sanitary wastewater
Treatment: surge tank to 6000 GPD sewage treatment plant with chlorine contact chamber
Location: at the point of discharge from the sewage treatment facility prior to combining
with other waters
Flow: max capacity 6000 GPD
Estimated Flow:
30 mobile homes @ 300 gpd = 9000 gpd
55 employees @ 20 gpd = 1100 gpd
Total = 10,100 gpd
Discharge Route: an unnamed facility ditch; thence into the South Lafourche Levee District Borrow
Canal

Please note that if the facility grows to a discharge beyond the design capacity of the facility, additional sewage treatment must be added with prior approval of the facility's plans by the Louisiana Department of Health and Hospitals and prior written notification to the Office of Environmental Services Water Permits Division. Also, if the expected flow reaches or exceeds the design capacity of the facility, a permit modification may be required.

Outfall 002

Discharge Type: external equipment washwater commingled with stormwater runoff from the
helicopter pads
Treatment: 9000 gallon oil/water separator
Location: at the point of discharge from the oil/water separator prior to combining with
other waters
Flow: 600 GPD
Discharge Route: an unnamed facility ditch; thence into South Lafourche Levee District Borrow
Canal

Outfall 003

Discharge Type: external equipment washwater commingled with stormwater runoff from the
helicopter pads
Treatment: 600 gallon oil/water separator
Location: at the point of discharge from the oil/water separator located east of Outfall 002,
prior to combining with other waters
Flow: 200 GPD
Discharge Route: an unnamed facility ditch; thence into South Lafourche Levee District Borrow
Canal

4. RECEIVING WATERS

STREAM - South Lafourche Levee District Borrow Canal

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BASIN AND SEGMENT - Terrebonne Basin, Segment 120706

- DESIGNATED USES -**
- a. primary contact recreation
 - b. secondary contact recreation
 - c. propagation of fish and wildlife
 - e. oyster propagation*

* Oyster Propagation is listed as a designated use of Subsegment 120706 (Bayou Blue - from Bully Camp Canal to Lake Raccourci). However, this designated use is applicable only if the discharge is directly into the named waterbody and not into a tributary or distributary of the waterbody, per LAC 33:IX.1111.A.

5. TMDL STATUS

Subsegment 120706, Bayou Blue - from Bully Camp Canal to Lake Raccourci (Estuarine), is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDLs have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

Changes from the previous permit:

1. Outfall 001 - Weekly Average limitations for BOD₅, TSS, and Fecal Coliform are now Daily Maximum in accordance with current guidance for similar discharges.
2. A narrative requirement has been included in the permit stating that if the facility grows to a discharge beyond the design capacity of the facility, additional sewage treatment must be added with prior approval of the facility's plans by the Louisiana Department of Health and Hospitals and prior written notification to the Office of Environmental Services Water Permits Division.
3. Outfall 003 has been added for the discharge of equipment washwater commingled with stormwater runoff from the new helicopter pad.

7. COMPLIANCE HISTORY/COMMENTS

- A. OEC - There are no open, appealed, or pending OEC enforcement actions as of October 23, 2009. A Notice of Deficiency was issued to the facility on June 8, 2005 for the areas of concern noted in the March 31, 2005 inspection (see below). A Deficiency Clear letter was issued July 18, 2005.
- B. INSPECTION - A compliance inspection completed on March 31, 2005 revealed the following:
1. The STP was properly operating and maintained.
 2. Effluent at each outfall was clear with no visible solids. Sheen was not observed in the receiving stream.

Areas of Concern:

1. DMRs were not completed for the May, 2004 sampling period.
2. May, 2004 samples at Outfall 002 did not include the pH and TSS parameters.

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3. May, 2004 sample at Outfall 001 exceeded the holding time for pH analysis.
4. Effluent monitoring samples were not collected at the two outfalls according to Part I requirements in the LPDES permit. Only one sampling event was performed in May 2004 for the past year.

C. DMR Review/Excursions – DMRs were reviewed for the period March, 2007 through June, 2009. The following excursions were noted:

Date	Parameter	Outfall	Reported Value	Permit Limits
June, 2008	TSS	001	37 mg/L (monthly average)	30 mg/L
June, 2008	Fecal Coliform	001	Too numerous to count (monthly average)	200 col/100 ml
June, 2008	Fecal Coliform	001	Too Numerous to count (daily max)	400 col/100ml

8. EXISTING EFFLUENT LIMITS

Outfall 001 – treated sanitary wastewater

Pollutant	Limitation		Frequency
	Monthly Avg	Weekly Average	
	mg/L (unless stated)		
Flow	Report	Report	1/quarter
BOD ₅	30	45	1/quarter
TSS	30	45	1/quarter
Fecal Coliform colonies/100ml	200	400	1/quarter
pH, s.u.	6.0 (min)	9.0 (max)	1/quarter

Outfall 002 – external equipment washwater commingled with stormwater runoff from the helicopter pads

Pollutant	Limitation		Frequency
	Monthly Avg	Daily Max	
	mg/L (unless stated)		
Flow	Report	Report	1/quarter
COD	---	125	1/quarter
TSS	---	45	1/quarter
Oil & Grease	---	15	1/quarter
Soaps & Detergents	Inventory Record	---	1/quarter
Oil & Grease, Visual	---	No Presence	1/quarter
pH, s.u.	6.0 (min)	9.0 (max)	1/quarter

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 120706 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ).

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Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Air Logistics, LLC

1. **Outfall 001** - treated sanitary wastewater (maximum capacity is 6,000 GPD)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow (GPD)	Report	Report	
BOD ₅	30	45	Similar discharges* (BPJ), LAG540000
TSS	30	45	Similar discharges* (BPJ), LAG540000
Fecal Coliform colonies/100ml	200	400	Similar discharges* (BPJ), LAG540000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG540000

Treatment: sewage treatment plant

Monitoring Frequency: Quarterly for all parameters at the point of discharge from the STP prior to mixing with other waters.

Limits Justification: Limits and monitoring frequencies are based on the previous permit and/or current guidance for similar discharges from other industrial facilities and the Class II Sanitary Discharge General Permit, LAG540000 effective July 1, 2008.

2. **Outfall 002** - external equipment washwater commingled with stormwater runoff from the helicopter pads (estimated flow is 600 GPD)
Outfall 003 - external equipment washwater commingled with stormwater runoff from the helicopter pads (estimated flow is 200 GPD)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow (GPD)	Report	Report	
COD	---	125	Similar discharges*, LAG480000 (BPJ)
TSS	---	45	Similar discharges*, LAG480000 (BPJ)
Oil & Grease	---	15	Similar discharges*, LAG480000 (BPJ)
Soaps & Detergents	Inventory Record	---	Similar discharges*, LAG480000 (BPJ)
Oil & Grease, Visual	---	No Presence	Similar discharges*, LAG480000 (BPJ)
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges*, LAG480000 (BPJ)

Treatment: oil/water separator

Monitoring Frequency: daily for Oil and Grease, Visual and quarterly for flow, TSS, COD, Oil and Grease, and pH at the point of discharge from the oil/water separator prior to mixing with other waters. Soaps and Detergents: document in a quarterly inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

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Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

Note: EPA Guidelines for Metal Products & Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements for exterior equipment washwater are being placed in the permit.

* Existing permits for similar outfalls

BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.h, facilities classified as SIC code 4522 are not considered to have storm water discharges associated with industrial activity unless they have "vehicle maintenance shops, equipment cleaning operations, or airport deicing operations." This facility does have vehicle maintenance and equipment cleaning operations.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance,** the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).